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Memorandum

To: Executive Committee
Date: February 28, 2001
Re: Project and Environmental Studies: FAP 340 (Interstate I-355 South Extension)

Below are excerpts from the Commission's 1994 and 1995 comments. They are paired with the portions of the December 2000 Draft SFEIS that address these points and the Commission's analysis of document responses.

I. THE ROLE OF THE HERITAGE CORRIDOR PLANNING COUNCIL

A. NIPC 1994 Overview Comment:

"The Corridor Planning Council that has been formed in the corridor should be used as ...the coordinating mechanism for project design, construction and monitoring."

The 1996 FEIS:

Section 4.20 Secondary and cumulative impacts, p. 4-78: There is a half page of text describing the creation and purposes of this council, and the mission of its Land Use and Planning Committee, although with no monitoring role mentioned specifically to do with the construction of this tollway.

The 2000 Draft SFEIS:

Section 4.20 Secondary and cumulative impacts, p. 4-34: There are only three lines saying "one of the purposes of HCPC (Heritage Corridor Planning Council) is to help plan for and manage development in and around the Project Corridor."
Section 4.20, p. 4-43: (two and a half lines) "The...[HCPC] provides additional control in that the participating governments have agreed to cooperate in planning for and managing development...."

NIPC comment at this time/February 21, 2001

6.1

The role of the Heritage Corridor Planning Council (and/or participating local governments) relative to the I355 extension has not been clearly defined in the 2000 Draft SFEIS. It needs to be explicitly stated that 1) the HCPC (or a similar organization) will have specific and comprehensive design reviewing and monitoring responsibilities prior to, during and after construction of this project, and 2) that IDOT/ISTHA will address valid concerns and be responsible to promptly and completely correct lapses from environmental mitigation plans as they are discovered and reported by the HCPC.

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B. NIPC 1995 General Comment:

"The Commission recommends ...an ongoing design committee to work with ISTHA to refine details of...all the features of the bridge...consideration of design in terms of the...history of the I&M Heritage Corridor. Committee could also provide input on...landscaping(and)noise barrier materials."

NIPC comment at this time/February 21, 2001

NIPC again recommends that an ongoing design committee be created. See comment I.A. above

C. NIPC 1994 Project Management and Coordination Comment:

"With previous construction of expressways, there has been a problem with the management of the construction process...DEIS needs to identify how monitoring and enforcement will be carried out by the project sponsor and responsible environmental agencies. ...helpful if...process open to...local government...and area environmental organizations...Perhaps planning and construction of the expressway could be used as a way of creating new citizen stewardship efforts along the corridor."

2000 SDEIS (unchanged from 1996 FEIS):

Section 6.5.2 Specific Measures or Other Commitments, p. 6-22:

"During the design phase...ISTHA will send to the involved local municipal, township or county governments preliminary plans applying to their areas...will be invited to comment...and indicate if they would be willing to participate in the costs..."

"During the design phase, tree mitigation plans will be submitted to the F.P.D. of Will County for comment."

"...a biologist, botanist, and ornithologist will be retained by ISTHA to observe construction startup activities adjacent to and within local forest preserves. The scientists will visit the site periodically and report all findings directly to ISTHA."

Section 4.23.4 (no change from 1996 FEIS, p. 4-81) Landscaping, p. 4-49:

"Landscaping design plans will be distributed to local park and forest preserve districts for their review prior to initiating the bidding process..."

NIPC comment at this time/February 21, 2001

Good environmental design and effective environmental mitigation on a project of this magnitude cannot be done on an uncoordinated, intermittent or piecemeal basis. NIPC strongly urges IDOT/ISTHA to define a role for HCPC (or a similar organization) in this process, beginning with the design phase, which will help insure that the I355 extension makes the least damaging impact on the environment as possible. See comment I.A. above.

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D. NIPC 1995 General Comment:

"The Commission continues to emphasize...a follow-up program in which compliance with the mitigation measures...is monitored...specifically the impacts of the construction process on sensitive environmental areas...The Corridor Planning Council (is an) appropriate mechanism to provide such a monitoring program."

NIPC comment at this time/February 21, 2001

The Commission once again emphasizes the importance of a follow-up program in which compliance with the mitigation measures is monitored.

II. Environmental and non vehicular features of the project corridor

A. NIPC 1994 Project Management and Coordination Comment:

"...strongly urge that the bikeway be built...there remains...the problem of the Toll Authority's statement that it cannot build or operate bikeways."

2000 DSEIS:

Section 4.7 Bikeways (no change from 1996), p. 4-14(1996): "ISTHA has committed to working with the local agencies on a potential bikeway plan that could benefit the local communities...The bikeway corridor may be rough graded and seeded by ISTHA depending on further coordination with local agencies. The design, construction, ownership, operation, maintenance and associated costs...would be the responsibility of entities or agencies other than IDOT or ISTHA."

NIPC comment at this time/February 21, 2001

4.5

It is easier to plan for the bikeway before design and construction of this project commence, than it will be to introduce it once design and construction have begun. As both a non-vehicular and a biological link to conservation areas in the south suburbs, this bikeway is very important to the region. We encourage IDOT/ISTHA to continue efforts to insure that a bikeway be included with this project.

B. NIPC 1994 Project Management and Coordination Comment:

"reference is made to using rip rap to stabilize stream banks after construction. This reveals that the general approach to dealing with streams may be inadequate. No mention is made of using bio-engineering techniques and natural materials as a preferred approach."

2000 SDEIS (unchanged from 1996 FEIS):

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Section 4.10.2.1 Construction Impacts to Surface Waters, pp. 4-23 & 4-24:
"channelized section of Spring Creek...and rip rap will be added."

NIPC comment at this time/February 21, 2001

4.6

We once again express our concern that the general approach to dealing with streams may be inadequate and strongly recommend that the EIS include environmentally friendly bio-engineered stream stabilization approaches. Because of the complex paper/CD format of the Draft SFEIS (December 2000), it is difficult to verify that our earlier comments have been addressed. It does appear that our earlier concerns about nonpoint source pollution, salt spray, compensatory flood storage, detention designs, stream crossings, etc.; have not been addressed.

C. NIPC 1994 Project Management and Coordination Comment:

"The DEIS references a native grass and wildflower component...it is strongly recommended that the roadway corridor be landscaped predominantly in native prairie vegetation, instead of turf grass."

2000 SDEIS (unchanged from 1996 FEIS):

Section 4.11.1.3 Landscape Restoration, p. 4-48:

"A native grass and wildflower component."

Section 4.11.1.2 Operational Impacts on Vegetation, p. 4-47

"Splash will be minimized by the design of grassed swales in the right-of-way."

Section 6.5.2 Specific Measures or Other Commitments, p. 6-22:

Native grass seed mixtures will be used as appropriate on the back slopes of ditches and the infields of interchanges.

Mowing restrictions...adjacent to forested areas...to minimize cowbird parasite activities. These restrictions will apply to the back slopes of ditches.

NIPC comment at this time/February 21, 2001:

4.23

NIPC once again recommends that IDOT/ISTHA landscape the roadway corridor predominantly in native prairie vegetation, instead of turf grass."

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